

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)

(jkim@kbbkllp.com)

David A. Taylor (#247433)

(dtaylor@kbbkllp.com)

Thomas B. Rupp (#278041)

(trupp@kbbkllp.com)

650 California Street, Suite 1900

San Francisco, CA 94108

Tel: (415) 496-6723

Fax: (650) 636 9251

*Attorneys for Appellees (Debtors and
Reorganized Debtors)*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**Reorganized
Debtors.**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Reorganized Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

District Court Case No. 22-cv-00389-HSG

**APPELLEES' (I) RESPONSE TO
WILLIAM F. WEIDMAN, III'S
APPELLANT'S CLARIFICATION AND
EXHIBIT LIST AND (II) DESIGNATION
OF ADDITIONAL ITEMS TO BE
INCLUDED IN THE RECORD ON
APPEAL**

PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Appellees**,” the “**Debtors**,” or as reorganized pursuant to the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [Dkt. No. 8048] (as it may be amended, modified, or supplemented and together with any exhibits or schedules thereto), the “**Reorganized Debtors**”) submit this response to the March 21, 2022 filing by William F. Weidman, III (“**Appellant**”) of the *Appellant’s Clarification and Exhibit List* [Dkt. No. 12051] (the “**Statement**”), and designation of additional items to be included in the record on appeal, in connection with Appellant’s appeal from the *Order Denying Motion for Reconsideration by William F. Weidman, III*, entered on December 15, 2021 [Dkt. No. 11706], by the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”).

I. RESPONSE TO STATEMENT OF ISSUES ON APPEAL

The sole issue on appeal is whether the Bankruptcy Court abused its discretion in denying Appellant’s motion for reconsideration of the order disallowing his claim, under the grounds for reconsideration available under Rule 60(b) of the Federal Rule of Civil Procedure.

II. DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN RECORD ON APPEAL

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the Reorganized Debtors hereby designate the following additional items to be included in the record on appeal, which include all exhibits and addenda attached thereto and filed therewith and all documents incorporated by reference therein:

Docket items from *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Dkt. No.	Description	Date
263	Amended Declaration of Jason P. Wells in Support of First Day Motions and Related Relief	02/01/2019
8053	Order Confirming Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020	06/20/2020

Dkt. No.	Description	Date
8228	Order Approving (A) Procedures for Filing Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections	06/30/2020
10494	Order Further Extending Deadline for the Reorganized Debtors to Object to Claims and Granting Related Relief	04/05/2021
11120	Reorganized Debtors' One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims)	08/19/2021
11121	Declaration of A. Anna Capelle in Support of Reorganized Debtors' One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims)	08/19/2021
11122	Notice of Hearing on Reorganized Debtors' One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims)	08/19/2021
11156	Certificate of Service of Sonia Akter	08/25/2021
11239	Opposition to Notice of the Reorganized Debtors' One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims); Declaration in Support Thereof	09/10/2021
11298	Reply in Support of Reorganized Debtors' Omnibus Objections to Claims	09/22/2021
11334	Certificate of Service of Joseph Ledwin	09/28/2021
11381	Order Disallowing Proof of Claim #10281 Filed by William F. Weidman, III	10/06/2021
11413	Certificate of Service of Alain B. Francoeur	10/13/2021
11444	Motion to Extend Time to File a Motion to Reconsider	10/19/2021
11446	Order Granting Extension of Time for William F. Weidman, III to File a Motion for Reconsideration	10/19/2021
11460	Certificate of Service of Rohany Tejada	10/21/2021
11507	Motion to Extend Time to File a Motion for Reconsideration	10/29/2021
11513	Order Granting Further Extension of Time for William F. Weidman, III to File a Motion for Reconsideration	11/02/2021
11552	Certificate of Service of Alain B. Francoeur	11/08/2021

Dkt. No.	Description	Date
11584	Order Granting Third Extension of Time for William F. Weidman, III to File a Motion for Reconsideration	11/16/2021
11596	Petition for Reconsideration	11/17/2021
11602	Order Regarding Motion for Reconsideration by William F. Weidman, III	11/19/2021
11624	Certificate of Service of Sonia Akter	11/29/2021
11635	Certificate of Service of Sonia Akter	11/30/2021
11643	Certificate of Service of Liliya Kulyk	12/01/2021
11688	Reorganized Debtors' Opposition to Motion for Reconsideration of William F. Weidman III	12/10/2021
11706	Order Denying Motion for Reconsideration by William F. Weidman, III	12/14/2021
11712	Certificate of Service of Sonia Akter	12/17/2021
11789	Certificate of Service of Joseph Ledwin	01/04/2022
11835	Notice of Appeal and Statement of Election	01/18/2022
12051	Appellant's Clarification and Exhibit List	03/21/2022

Hearing Transcripts from *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Dkt. No.	Description	Date
11364	September 29, 2021 Hearing Transcript	10/01/2021

Proofs of Claim filed in *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Claim No.	Claimant	Date
10281	Wm. F. Weidman, III	09/30/2019

1 The Reorganized Debtors reserve the right to designate additional items for inclusion in the
2 record or restate the issues presented on appeal.

3 **III. RESPONSE TO APPELLANT'S DESIGNATION OF RECORD**

4 Appellant's Statement does not designate any docket entries or transcripts in the Chapter 11
5 Cases, but instead refers to its four attached exhibits. Exhibits B, C, and D appear to contain
6 documents identical to those attached as Exhibits 2, 1, and 3, respectively, to Appellant's *Petition for*
7 *Reconsideration*, filed on November 17, 2021 [Docket No. 11596], which is designated in its entirety
8 in Section II, *supra*. The letter submitted as Exhibit A does not appear to have been previously filed
9 with the Bankruptcy Court. Appellees submit that only those documents actually filed with the
10 Bankruptcy Court in connection with its ruling on the order that is the subject of the appeal are part of
11 the record on appeal, and Appellees reserve all rights and defenses thereto.

12
13 Dated: April 4, 2022

14 **KELLER BENVENUTTI KIM LLP**

15
16 By: /s/ Jane Kim
Jane Kim

17 *Attorneys for the Appellees (Debtors and*
18 *Reorganized Debtors)*
19
20
21
22
23
24
25
26
27
28